

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA
Plaintiff,

v.

ERIKA SUSAN PERDUE,
Defendant.

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No. 3:12-CR-134-L

E.C.F.

DEFENDANT'S UNOPPOSED MOTION FOR TRANSFER TO
FMC CARSWELL FOR MEDICAL CARE

TO THE HONORABLE COURT:

Defendant Erika Susan Perdue respectfully moves this Court for an order instructing the U.S. Marshall's service to transfer her from her current location in the Mansfield jail to the medical facility FMC Carswell for medical care, and in support presents the following:

1. Defendant has a number of medical issues and conditions that have required attention by the medical staff at the Mansfield jail, and she has even been taken by the jail staff to an outside hospital Emergency Room recently. The medical staff has determined that they cannot adequately treat Ms. Perdue's conditions at this time.

2. This morning, the jail physician examined Ms. Perdue and made the following recommendation in his written notes on this patient: "Recommend xfer to Carswell for medical care." In another paragraph of these same physician's notes, the doctor states that one of her conditions needs to be addressed "asap."

3. Undersigned counsel is in possession of the physician's notes and certifies as an officer of the court that they are the official signed notes received directly from the Mansfield jail

facility this morning, October 18, 2012, and that the above quotes are accurate and in proper context.

4. Based on the privacy laws regarding patient medical records that apply to all citizens, those notes are not being attached to this motion since this motion will be of public record through PACER. The contents would undoubtedly reveal things about Ms. Perdue's medical condition that outsiders have no need to know. However, counsel will make the notes available to the Court for en camera inspection upon request.

5. Counsel spoke with Assistant United States Attorney Camille E. Sparks who stated that the government does not oppose this motion.

WHEREFORE, Defendant Perdue respectfully asks the Court to grant this Motion and issue an order that Defendant Perdue be immediately transferred to FMC Carswell for medical care.

Respectfully submitted,

/s/ Deborah Goodall

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Attorneys for Defendant
Erika Susan Perdue

CERTIFICATE OF CONFERENCE

I certify that I spoke with AUSA Camille Sparks about this Motion and the grounds therefor, and she expressed no objection to the Court's ordering this transfer.

/s/ Deborah Goodall
DEBORAH GOODALL

CERTIFICATE OF SERVICE

I hereby certify that on October 18, 2012, I caused a copy of the foregoing Motion to be delivered to the Honorable Sam A. Lindsay, United States District Judge, Northern District of Texas; and Assistant United States Attorney Camille E. Sparks, at 1100 Commerce Street, Dallas, Texas, 75202.

/s/ Deborah Goodall
DEBORAH GOODALL